Date: 1/2/07

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	Robert Sorrentino
1/2/2	Senior Vice President, Taxes, Random House, Inc.
Date: 1/2/07	Date:
James Frey Big Jim Industries, Inc.	Robert Sorrentino
Date: 1/2/07	President, Doubleday & Company, Inc.
Date: 1/2/07	Date:
In Rome	
Maya Frey	Robert Sorrentino
	Vice President, Taxes, Random House VG, Inc.
Date: 1/2/07	
	Date:
- Pull herry	
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants

Date:_____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS.
James Frey	Robert Sorregano Senior Vice President, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey	Robert Sorrenting
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
Date:	Date: 12/28/2006

FOR THE PLAINTIFFS:

Plaintiff Maroto Vedral	Michele Snow
Carry D. Drury I.Ad. Larry D. Drury I.Ad. 265 W. Randolph Street. Suite 1430 Chicago. Himois 60606 Proposed Co-Leud Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plana, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Lead Class Comsel Attorney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Color Date:	Plantiff Atm Marie Strack
Thomas Multaney 708 Third Avenue, Suite 2500	Thomas A. Ziminerman, Jr. Zimmerman and Associates, P.C.
New York, New York 1001? Phone: (212) 223-0800 Lluison Class Counsel Attorneys for Plaintiff Jennifer Cohn	100 West Monroe Street, Suite 1300 Chreago, Illinois 60603 Attorney or Plaintiff Ann Marie Struck
Date:	Date:

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606 Proposed Co-Lead Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plaza, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Lead Class Counsel Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Diane Marolda	Plaintiff Ann Marie Strack
Date: 12/1/00	Date:
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500 New York, New York 10017	Zimmerman and Associates, P.C.
Phone: (212) 223-0800	100 West Monroe Street, Suite 1300 Chicago, Illinois 60603
Liaison Class Counsel Attorneys for Plaintiff Diane Marolda	Attorney or Plaintiff Ann Marie Strack
Date: 12-5-2004	Date:

FOR THE PLAINTIFFS:

Date:
Evan J. Smith, Esquire
Brodsky & Smith, LLC
Two Bala Plaza, Suite 602
Bala Cynwyd, PA 19004
(610) 667-6200
Proposed Co- Lead Class Counsel
Attorney for Plaintiff Michele Snow
Date:
Plaintiff Ann Marie Strack
Date: 12-8-06
That I do
Thomas A. Zimmerman, Jr.
Zimmerman and Associates, P.C.
100 West Monroe Street, Suite 1300
Chicago, Illinois 60603
Attorney or Plaintiff Ann Marie Strack
Date: 12-11-2006

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Plaint I Jimpy Hoyd	Plaintiff Jill Giles
Dest 1/4/07 - 1	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center
New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street Cincinnati. Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: December 5, 2006	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Scattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich	

Date:_

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: 11/29/06	Date:
Plaintiff Pilar More Date: 11 / 29/06	Plaintiff Shera Paglinawan Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackenrich	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Dakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich Date:	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Starman
Napoli Bern Ripks LLP	Colleen M. Hegge (of counsel)
115 Broadway	2900 Chemed Center
New York, New York 10006	255 East Fifth Street
Attorney for Plaintiff Jimmy Floyd	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
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Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
The state of the state of	I sautott Stiera i aginiawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw Date:
Date	Michael David Myers
Date:	Myers & Company, P.L.L.C.
	1809 Seventh Avenue, Suite 700
	Seattle, Washington 98101
	Attorney for Plaintiff Shera Paglinawan
San Back on	Date:
Plain of Sara Brackenrich	
Date: 20 Nov. 06	
Difformaso & Lubin, PC	

	- Will Geles / by be asking fly C. A.
Plaintiff Jimmy Floyd	Flaintiff Jill Giles
Date:	Date: 12-7-0 6
Alan S. Ripka	
	Alan Statman
Napoli Bern Ripka LLP 115 Broadway	Colleen M. Hegge (of counsel)
New York, New York 10006	2900 Chemed Center
Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street
stiorney for Figurity Jimmy Floyd	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Pilar Morc	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilat More Date:	Michael David Myers Myers & Company, P.L.C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso	
Di I ommaso & Lubin, PC	
17W 220 22nd Street, Suite 200	
Oakbrook Terrance, Illinois 61081	
Attorney for Plaintiff Sara Brackenrich	
Date:	
TO THE PARTY OF TH	

Plaintiff Jill Giles Date: Alan J. Statman
Date:
Alex I Co
Alex Y. C.
Alan J. Statman
Colleen M. Henge (of comment)
~ Jou Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Attorneys for Plaintiff Jill Giles
Date:
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Shur Dre
Plaintiff Shera Paglinawan
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Date: 3 Dec. 2002
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Plaintiff Wendy Shaw
Date:
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THORAGI DAVID Myore
Myers & Company, PLL.C.
1007 Deventh Avenue Contact
- William Wallington Dates
Attorney for Plaintiff Shera Paglinawan
Date: /2 2
Date: 12 . 3 . 2006

Plaintiff Jill Giles
Date:
Alan J. Statmon
Collecn M. Hogge (of counsel)
2900 Chemed Center
255 East Fifth Street
Cincirmati, Ohio 45202
Attorneys for Plaintiff Jill Giles
Date:
Plaintiff Shera Paglinawan
Date:
Plaintiff Wondy Shaw Date: 2/06
Michael David Myers
Myers & Company, P.L.L.C.
1809 Seventh Avenue, Suite 700
Seattle, Washington 98101 Autorney for Platniff Shera Paglinawan
Date: